



VAUGHNSVILLE TELEPHONE COMPANY, INC.

BOX 127 • VAUGHNSVILLE, OHIO 45893-0127 • 419-646-3431

June 26, 2017

REDACTED - FOR PUBLIC INSPECTION

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Vaughnsville Telephone Company (SAC 300663). WC Docket Nos. 10-90, 14-58;
2017 FCC Form 481, Redacted Confidential Document

Dear Secretary Dortch:

In compliance with Federal Communications Commission rules at 47 CFR §§ 54.313 and 54.422, Vaughnsville Telephone Company (SAC 300663) herewith submits its 2017 FCC Form 481 as a Redacted Confidential Document.

This filing is made in accordance with the Protective Order (*In the Matter of Connect America Fund ETC Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, DA16-296, released March 22, 2016).

Thank you for your attention to this matter. Should you or any member of the Commission Staff have any questions or comments, please do not hesitate to contact us at your convenience.

Very truly yours,

Martha J. Kaplan, Secretary-Treasurer

Attachment

STATEMENT OF CONFIDENTIALITY REQUEST AND JUSTIFICATION

Vaughnsville Telephone Company (the "Company") is a small, rural local exchange company based in Ohio. The Company requests confidential treatment of certain information being provided to the Commission in its 2017 FCC Form 481, because the information is competitively sensitive and its disclosure would have a negative competitive consequence upon the Company were it to be made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 CFR § 0.459.

Specifically, the Company requests that the documentation required in Section 3005 (Rate of Return Carrier Additional Documentation) pursuant to 47 CFR § 54.313(f)(2), which consists of the Company's financial results, including income statement, balance sheet, cash flow statement and financial data summary (Lines 3017, 3026 and 3027-3034 inclusive), be accorded confidential treatment (collectively "Confidential Information").

Degree to Which the Information in Question is Commercial or Financial, or Contains a Trade Secret or is Privileged.

The information sought in FCC Form 481 at Section 3005 is financial information, specifically all or parts of the Company's income statement, balance sheet and cash flow statement. Financial information clearly is deserving of confidential treatment. This is closely guarded, Confidential Information that the Company does not make publicly available.

The Confidential Information is also a trade secret under 5 U.S.C. 552(b)(4). While there is no clear federal definition, the *Uniform Trade Secrets Act* defines trade secret as information that derives independent economic value, actual or potential, from not being generally known to or readily ascertainable through appropriate means by other persons who might obtain economic value from its disclosure or use and is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The information for which confidential treatment is sought meets that definition.

Degree to Which the Information Concerns a Service that is Subject to Competition.

Ohio has successfully opened its telecommunications markets to full competition. The services offered by the Company, including voice and broadband services, are subject to vigorous competition from competitive local exchange carriers, cable operators, wireless carriers and VoIP providers. Many of the Company's competitors are large, well-financed and national, even international in scope.

Manner in Which Disclosure of the Information Could Result in Substantial Competitive Harm.

The Confidential Information could be employed by both existing and potential competitors in a variety of ways, including: to determine the size of the market; the profitability of the market; and the financial resources of the Company. Clearly, were the Confidential Information to be made public, competitors could and would use this information to their competitive advantage. Moreover, disclosure would adversely affect the Company's ability to conduct business with other carriers.

Measures Taken to Prevent Unauthorized Disclosure.

The Company has taken precautions to guard the secrecy of its network plans and financial results, including the Confidential Information, by limiting its dissemination. The Confidential Information is not known outside of the Company, except on a need to know basis with confidential protections (i.e., consultants, attorneys, and lenders), and is known within the Company only to senior managers and a limited number of employees with a particular need to know. The Company has expended a significant amount of time and money in developing the Confidential Information. The Confidential Information cannot be replicated by any other means.

Availability of the Information to the Public and Extent of Any Previous Disclosure of the Information to Third Parties.

The Confidential Information is not available to the general public and has never been disclosed to any outside third parties, except as described in the preceding paragraph.

Justification of the Period During Which the Material Should Not be Available for Public Disclosure.

The Company requests that the Confidential Information be maintained on a confidential basis indefinitely. Disclosure of the information at any time would be harmful.

Any Other Information That the Party Seeking Confidential Treatment Believes May Be Useful In Assessing Whether Its Request For Confidentiality Should Be Granted.

Exemption 4 of the Freedom of Information Act protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." 5 U.S.C. § 552(b)(4). The exemption affords protection to those submitters who are required to furnish commercial or financial information to the government by safeguarding them from the competitive disadvantages that could result from disclosure. If the financial information relates to business or trade, courts have considered it "commercial or financial." *See, e.g., Dow Jones Co. v. FERC*, 219 F.R.D. 167, 176 (C.D. Cal. 2002) (information relating "to business decisions and practices regarding the sale of power, and the operation and maintenance" of generators (quoting agency declaration)); *Merit Energy Co. v. United States Dep't of the Interior*, 180 F. Supp. 2d 1184, 1188 (D. Colo. 2001) ("information regarding oil and gas leases, prices, quantities and reserves"), *appeal dismissed*, No. 01-1347 (10th Cir. Sept. 4, 2001). The Confidential Information satisfies this test as well.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED - FOR PUBLIC INSPECTION**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	300663
<015>	Study Area Name	VAUGHNSVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Marty Kaplan
<035>	Contact Telephone Number: Number of the person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	vvtelco@bright.net
	Form Type	54.313 and 54.422

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<210> For the prior calendar year, were there any reportable voice service outages? No

Page 2

REDACTED - FOR PUBLIC INSPECTION**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	300663
<015>	Study Area Name	VAUGHNSVILLE TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

REDACTED - FOR PUBLIC INSPECTION

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	300663
<015>	Study Area Name	VAUGHNSVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvstelco@bright.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
300663oh510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	FCC Form 481
	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	300663
<015>	Study Area Name	VAUGHNSVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	300663oh610.pdf

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<711>

-- See attached worksheet --

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

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**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
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July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**
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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 300663oh1010.pdf

Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 300663oh1030.pdf

Name of Attached Document

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**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	300663
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvitelco@bright.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

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(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

300663oh1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | | |
|---------------------|---|-------------------------------------|
| <1221> | Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> | Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> | Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

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(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

<010>	Study Area Code	300663
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vvitelco@bright.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.
- <2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.
- <2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2024A> Round 2 Recipient of Incremental Support?
- <2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.
- <2025A> Round 2 Recipient of Incremental Support?
- <2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).
- <2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Name of Attached Document Listing
Required Information

Name of Attached Document Listing
Required Information

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(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		Yes - Attach Certification
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; padding: 2px;">300663oh3010.pdf</div>
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; height: 20px;"></div>
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<div style="display: flex; justify-content: space-around;"> <input checked="" type="radio"/> <input type="radio"/> </div>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<div style="display: flex; justify-content: space-around;"> <input type="radio"/> <input checked="" type="radio"/> </div>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto;"></div>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto;"></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; height: 20px;"></div>
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<div style="display: flex; justify-content: space-around;"> <input type="radio"/> <input checked="" type="radio"/> </div>
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto;"></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto;"></div>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto;"></div>
	If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto; text-align: center;">✓</div>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto; text-align: center;">✓</div>
(3024)	Underlying information subjected to an officer certification.		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto; text-align: center;">✓</div>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<div style="border: 1px solid black; width: 40px; height: 15px; margin: 0 auto; text-align: center;">✓</div>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; padding: 2px;">300663oh3026.pdf</div>

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(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<039>	Contact Email Address - Email Address of person identified in data line <030>	vytelco@bright.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

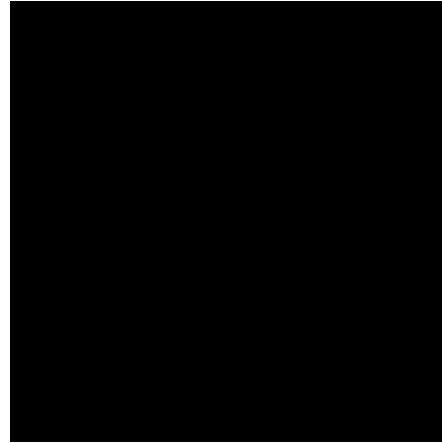
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
--	--	--

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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**Certification - Reporting Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: VAUGHNSVILLE TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/28/2017
Printed name of Authorized Officer: Martha Kaplan	
Title or position of Authorized Officer: Sec-Treas	
Telephone number of Authorized Officer: 4196463431 ext.	
Study Area Code of Reporting Carrier: 300663	Filing Due Date for this form: 07/03/2017
<small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small>	

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**Certification - Agent / Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	300663
<015> Study Area Name	VAUGHNSVILLE TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035> Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
<p>Name of Authorized Agent: _____</p>	
<p>Name of Reporting Carrier: _____</p>	
<p>Signature of Authorized Officer: _____</p>	<p>Date: _____</p>
<p>Printed name of Authorized Officer: _____</p>	
<p>Title or position of Authorized Officer: _____</p>	
<p>Telephone number of Authorized Officer: _____</p>	
<p>Study Area Code of Reporting Carrier: _____</p>	<p>Filing Due Date for this form: _____</p>
<p><small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small></p>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
<p>Name of Reporting Carrier: _____</p>	
<p>Name of Authorized Agent Firm: _____</p>	
<p>Signature of Authorized Agent or Employee of Agent: _____</p>	<p>Date: _____</p>
<p>Name of Authorized Agent Employee: _____</p>	
<p>Title or position of Authorized Agent or Employee of Agent: _____</p>	
<p>Telephone number of Authorized Agent or Employee of Agent: _____</p>	
<p>Study Area Code of Reporting Carrier: _____</p>	<p>Filing Due Date for this form: _____</p>
<p><small>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</small></p>	

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Attachments

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(700) Price Offerings including Voice Rate Data Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	300663
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<015>	Study Area Name	VAUGHNSVILLE TEL CO
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<020>	Program Year	2018
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<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431	ext.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net
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1/1/2017

<703>

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(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	300663
<015>	Study Area Name	VAUGHNSVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Marty Kaplan
<035>	Contact Telephone Number - Number of person identified in data line <030>	4196463431 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	vvtelco@bright.net

[illegible]

Vaughnsville Telephone Company (SAC 300663)

Line 510, Service Quality Standards and Consumer Protection Rules Compliance

Documentation of the company's compliance with certification requirements pursuant to 47 CFR §54.313(a)(5).

In addition to the rules and regulations contained in Title 47, Code of Federal Regulations, Vaughnsville Telephone Company is subject to the following Service Quality Standards and Consumer Protection Rules of the Public Utilities Commission of Ohio:

Ohio Administrative Code

- 4901:1-6-07 Customer Notice Requirements
- 4901:1-6-09 Eligible Telecommunication Carrier certification (high cost and Lifeline).
- 4901:1-6-11 Tariff Services
- 4901:1-6-12 Service Requirements for BLES (Basic Local Exchange Service), including installation and repair intervals, deposits, payments and disconnection.
- 4901:1-6-13 Warm line service.
- 4901:1-6-14 BLES pricing parameters, including late payment charges and reconnection fees.
- 4901:1-6-15 Directory Information.
- 4901:1-6-16 Unfair or deceptive acts and practices.
- 4901:1-6-17 Truth in billing requirements.
- 4901:1-6-18 Slamming and preferred carrier freezes.
- 4901:1-6-19 Lifeline requirements.
- 4901:1-6-20 Discounts for persons with communications disabilities.
- 4901:1-6-27 Provider of last resort (POLR).
- 4901:1-6-30 Company records and complaint procedures.
- 4901:1-6-31 Emergency and outage operations.
- 4901:1-7-03 Toll presubscription.
- 4901:1-7-22 Customer Migration
- 4901:1-7-24 Local number portability (LNP).
- 4901:1-7-26 Competition safeguards (CPNI).

Ohio Revised Code

- 4927.06 Unfair or deceptive trade practices.
- 4927.08 Basic local exchange service standards.
- 4927.09 Access to 9-1-1 service.
- 4927.11 Access to basic local exchange service.
- 4927.12 Alteration of rates for basic local exchange service.
- 4927.13 Lifeline service for eligible residential customers.
- 4927.14 Adoption of rules for rates for persons with disabilities.
- 4927.15 Rates, terms and conditions for 9-1-1 and other services.
- 4927.17 Notice of rates, terms or conditions of service; contact information to be provided on bills and notices.
- 4927.21 Complaints against telephone company.

The company has established policies and procedures designed to protect consumers, including publishing customer rights, formal complaint procedures, and policies related to privacy, slamming and network management.

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The company observes strict compliance to all CPNI rules, including training for new employees, refresher training for current employees, maintaining written practices for handling CPNI and submitting annual certifications to regulatory agencies. The CPNI manual is available for inspection at the company business office. The company uses third party verification to prevent slamming and uses a contracted service order administrator to process LNP requests within the time constraints contained in the rules. Customer billing is performed by a billing vendor that maintains software that complies with all truth in billing requirements, including the information that is required to be displayed on the customer bill. The company maintains a CALEA manual and utilizes a third party vendor to make sure that all CALEA requests are processed in accordance with applicable laws and regulations. The CALEA manual and procedures are filed with the appropriate agencies and are also maintained at the company business office.

The company's Basic Local Exchange Service Tariff, PUCO No. 4, contains BLES pricing, 9-1-1, Lifeline and IntraLATA presubscription information, terms and conditions. The tariff is available at the company business office and in the tariff section of the PUCO website <http://www.puco.ohio.gov>.

While all of the regulations apply to the regulated, voice services provided by the Company, many also apply to the provision of broadband services, such as CALEA, CPNI, truth in billing, unfair or deceptive acts or practices, emergency operations and network management. The company adheres to those standards that apply to broadband service in the same manner as it does for voice service. Some examples of regulations that do not apply to broadband are Warm Line Service, BLES requirements, directory information and toll presubscription.

Other sections of FCC Form 481 contain additional information regarding the following:

Lifeline terms and conditions - Line 1210

Emergency operations - Line 610

Vaughnsville Telephone Company (SAC 300663)
Line 610, Functionality in Emergency Situations

Documentation of the company's processes implemented to assure compliance with certification requirements pursuant to 47 CFR §54.313(a)(6) and §54.202(a)(2).

Vaughnsville Telephone Company has an employee call-out procedure in place to mobilize its entire workforce in the event of an emergency situation. The notification process utilizes landline, cellular and internet technologies. In the event of total failure of all communications technologies, company practices include having employees report to the central office to obtain further instructions.

The central office and core network functionality is supported by a minimum of 8 hours of battery reserve and a 30 KW generator set capable of running continuously for 200 hours before needing to be refueled. Network nodes containing active electronic equipment are equipped with battery backup. The company maintains a number of portable generator sets that can be deployed to network nodes in the event a power outage exceeds the battery reserve capacity.

The facility network is designed as a diverse-routed fiber optic ring, capable of instantaneously switching traffic around damaged facilities. The Company has arrangements with multiple splicing contractors for rapid deployment and restoration of fiber optic cables. Separate facilities support the PSTN and broadband network connections to other carriers. In the event that all PSTN facilities are damaged, the central office switch is capable of both TDM and IP formats, providing the ability to reroute PSTN traffic via dedicated IP facilities to other carriers.

The network is capable of managing traffic spikes caused by emergency situations. This is accomplished by maintaining properly sized trunk groups to the PSTN and by providing substantial broadband backbone bandwidth capable of carrying overflow voice traffic in addition to data traffic.

The capabilities and procedures listed above apply to the Company's voice and broadband networks since many functions are intertwined. For example, the fixed, central office generator set provides power to both the voice switching and circuit equipment as well as the DSLAMs, routers, optical terminals and other broadband equipment. The same is true for the portable generator sets that provide emergency power to the voice and broadband equipment located in the field network nodes. Personnel call-out and response is identical for situations that interrupt the voice as well as broadband network.



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VAUGHNSVILLE TELEPHONE COMPANY, INC.

BOX 127 • VAUGHNSVILLE, OHIO 45893-0127 • 419-646-3431

June 22, 2017

RE: FCC Form 481, Line 1010

Vaughnsville Telephone Company (SAC 300663) certifies that its residential voice service rates are less than two standard deviations above the national average urban rate for voice service, as specified in the most recent public notice issued by the Wireline Competition Bureau (DA 17-167). The voice service rate is \$18.00, which is below the national average urban rate floor of \$22.49. As such, it is well below two standard deviations above the national average urban rate (the reasonable comparability benchmark rate of \$49.51).

Martha J. Kaplan, Secretary-Treasurer
Vaughnsville Telephone Company



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VAUGHNSVILLE TELEPHONE COMPANY, INC.

BOX 127 • VAUGHNSVILLE, OHIO 45893-0127 • 419-646-3431

Line 1030, Broadband Services Rate Comparability

June 22, 2017

RE: FCC Form 481, Line 1030

Vaughnsville Telephone Company (SAC 300663) certifies that its residential broadband service rates are less than the national urban benchmark rate for broadband service, as specified in the public notice issued by the Wireline Competition Bureau (DA 17-167). The current broadband service rate for 10 Mbps download speed and 1 Mbps upload speed with unlimited usage is \$67.00 when purchased as broadband-only service, which is below the national urban benchmark of \$77.98.

Martha J. Kaplan, Secretary-Treasurer

Vaughnsville Telephone Company (SAC 300663)
Line 1210, Terms and Conditions for Lifeline Customers

Vaughnsville Telephone Company (SAC 300663) has established terms and conditions for Lifeline customers that incorporate the federal and state requirements as documented in its Basic Local Exchange Service Tariff PUCO No. 4, Section 5, Second Revised Sheet No. 1.

The Company shall provide Lifeline service as defined in 47 C.F.R. § 54.401 (a) on a non-discriminatory basis to all qualifying low-income customers. The Company's Lifeline service offering shall comply with all applicable federal and state laws, including, but not limited to, 47 C.F.R. Part 54, Subpart E; the FCC's Lifeline reform order (Report and Order released February 6, 2012, WC Docket No. 11-42, et al.), the FCC Lifeline Modernization Order (Third Report and Order, Further Report and Order, and Order on Reconsideration released April 27, 2016, WC Docket No. 11-42, et al.), and any subsequent clarifying orders; Section 4927.13, Revised Code; Rule 4901:1-6-19, Ohio Administrative Code; and, the Commission's nontraditional Lifeline service order (Finding and Order adopted May 23, 2012, Case No. 10-2377-TP-COI) and any subsequent entries and/or orders.

In 2014, the company began participating in the National Lifeline Availability Database (NLAD). This database is designed to help the company identify and resolve duplicate claims for Lifeline Program-supported service and to prevent future duplicates. All applications for Lifeline service are verified using NLAD in order to prevent duplicate service from being established.

The Lifeline discount applies to Basic Local Exchange Service (BLES) as defined by Ohio Revised Code 4927.01(A)(1). For residence customers, BLES consists of local dial tone service, flat-rate telephone exchange service, touch-tone dialing service, access to and usage of 9-1-1 services, provision of a telephone directory at no charge, listing in that directory, per call caller identification blocking services, access to telecommunications relay service and access to toll presubscription, interexchange or toll providers or both, and networks of other telephone companies. The company also provides an optional toll denial feature at no additional charge. The rate for residential BLES is \$18.00 per month as of January 1, 2017.

The company applies the Lifeline support amount as follows: first, to waive the End User Common Line EUCL Charge of \$6.50 and second, to discount the residential BLES charge with the remaining balance of the support amount, in compliance with 47 CFR §54.403(b).

Residential BLES customers may also add optional service features and subscribe to a variety of long distance calling plans offered by the company. No discount is applied to these services because the entire Lifeline support amount is exhausted after applying it to the EUCL and BLES charges.



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VAUGHNSVILLE TELEPHONE COMPANY, INC.

BOX 127 • VAUGHNSVILLE, OHIO 45893-0127 • 419-646-3431

Line 3010

June 22, 2017

RE: FCC Form 481, Line 3010B

Pursuant to 47 CFR §54.313(f)(1)(i), Vaughnsville Telephone Company (SAC 300663) certifies that it is able to provide broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream to all customers within its study area, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

In support of this certification, the Company's broadband network utilizes a fiber ring to serve multiple VDSL nodes and is capable of speeds of at least 15 Mbps downstream and 2 Mbps upstream. The company provides unlimited usage with all of its broadband offerings. Requests for service are typically fulfilled within one to two business days, oftentimes on the same day as the request.

Martha J. Kaplan, Secretary-Treasurer

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Financial Information Redacted in its Entirety

Attachment Line 3026

Attachment Redacted in its Entirety